



June 3, 2019

2323 N. Larch St.
Lansing, MI 48906
517.371.1550

Mr. Eric Allen
Safety and Health Manager
MIOSHA Construction Safety and Health Division
P.O. Box 30013
Lansing, Michigan 48909

26001 Five Mile Rd.
Redford, MI 48239

agcmichigan.org

Dear Mr. Allen,

This letter has been provided at your request to the comments that were provided by Mr. Paul Wrzesinski at the public hearing held on May 1, 2019 regarding the proposed changes to the CONSTRUCTION SAFETY AND HEALTH STANDARD PART 14. TUNNELS, SHAFTS, CAISSONS, AND COFFERDAMS.

The rule in questions was rule R408. 41461 (4)) If the work operations of any occupied tunnel projects are discontinued for 30 consecutive days or longer, then the employer shall notify the Construction Safety and Health Division at the Michigan Department of Licensing and Regulatory Affairs, construction safety and health division at the Michigan department of licensing and regulatory affairs, 24 hours before resuming work operations on the tunnel project.

Would this rule apply to "any tunnel project" that is occupied under atmospheric conditions or only those that are pressurized during construction, modification, or repair and are more than 24 inches in diameter?

Sincerely,

Paul Wrzesinski

Director of Safety Health

Associated General Contractors of Michigan.



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